

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

GAIL CORVELLO, et al.,	)	
Plaintiffs,	)	C.A. No. 05-0221S
	)	(Related Case Nos.: 05-522S,
v.	)	05-274S, 05-370S)
	)	
NEW ENGLAND GAS COMPANY;	)	
SOUTHERN UNION COMPANY	)	
Defendant and	)	
Third-Party Plaintiff,	)	
	)	
v.	)	
	)	
BRIDGESTONE AMERICAS TIRE	)	
OPERATIONS, LLC and	)	
HONEYWELL INTERNATIONAL INC.	)	
Third-Party Defendants.	)	

**JOINT MOTION TO AMEND PRETRIAL ORDER**

Pursuant to Fed.R.Civ.P. 26 and LR Cv 26, Third Party Plaintiff Southern Union Company/ New England Gas Company (collectively, "Southern Union") and Third-Party Defendants Bridgestone Americas Tire Operations, LLC ("Bridgestone") and Honeywell International Inc. ("Honeywell") jointly request that the Court amend its Pretrial Order entered on March 5, 2012, by amending the dates contained therein as follows:

1. All factual discovery closed by: August 3, 2012
2. All expert discovery closed by: January 18, 2013
3. Dispositive motions filed by: February 15, 2013
4. Third-Party Plaintiff expert witness disclosures: September 28, 2012
5. Third-Party Defendants' expert witness disclosures: November 2, 2012
6. Pretrial Memoranda, if no dispositive motions: February 15, 2013  
(or 30 days after decision on dispositive motions)

In support of this joint motion, the parties state that Southern Union and Bridgestone engaged in mediation, reached a settlement in principle and are working on final settlement documents. Southern Union and Honeywell anticipate mediating within the next thirty (30) days and would like this approximate sixty (60) day extension of fact discovery to conduct mediation and, if no settlement is reached, complete remaining fact discovery and then engage in other pre-trial work. The parties respectfully request that the Court amend the Pretrial Order by extending the dates as set forth above.

SOUTHERN UNION COMPANY AND  
NEW ENGLAND GAS COMPANY

HONEYWELL INTERNATIONAL INC.

By its Attorneys,

By its Attorneys,

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**BRIDGESTONE AMERICAS TIRES  
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Dated: May 24, 2012

CERTIFICATE OF SERVICE

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I hereby certify that on the 24th day of May, 2012, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Robin L. Main

#50724892 (14015/126110)